

UNITED STATES DISTRICT COURT
 for the
Eastern District of Michigan

United States of America

v.

Deontay Ford

Case: 1:23-mj-30499

Judge: Morris, Patricia T.

Filed: 12-21-2023

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 28, 2023 in the county of Saginaw in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)	Possession with Intent to Distribute
18 U.S.C. § 924(c)(1)(A)(i)	Possession of a Firearm in Furtherance of Drug Trafficking

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



Leon Wilson
Complainant's signature

Leon Wilson, TFO F.B.I.

Printed name and title



Patricia T. Morris
Judge's signature

Hon. Patricia T. Morris, U.S. Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 21, 2023

City and state: Bay City, Michigan

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Leon Wilson, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, that is, I am authorized by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

2. I am a police officer in the State of Michigan and have been since 2007. I am currently assigned to the Mid-Michigan Safe Streets Task Force (“MMSSTF”) with the Federal Bureau of Investigation (“FBI”) as a Task Force Officer and have been since March 2023. As such, I investigate violent individuals and street gangs for various violations of federal and state law, including narcotics trafficking. Accordingly, I am familiar with the ways in which gangs and drug trafficking organizations and violent criminal organizations normally operate.

3. The facts in this affidavit come from my personal observations, training, experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. On September 28, 2023, the Saginaw Township Police Department responded to a complaint at 5783 Ambassador Drive in Saginaw Township, MI 48603. The complaining witness advised that a suspicious vehicle in the parking lot running for several hours with the headlights on.

5. Sgt. Flemming arrived on scene, looked into the vehicle and saw two subjects that appeared to be passed out. Sgt. Flemming saw in plain sight what she believed to be the handle of a handgun protruding from the waistband of the driver. Officer's West, Gibson, and Preston arrived on scene to assist with the investigation.

6. The two subjects were identified as Devontae Haynes, the driver, and Deontay Ford, the front passenger. Both Haynes and Ford were removed from the vehicle and detained.

7. During the search of the vehicle, a Glock 21 45 semi-automatic pistol was recovered from Haynes' person. The firearm was loaded with one in the chamber. Near the center console, a stolen Springfield Armory XD-40 firearm was located. The firearm was loaded with one round in the chamber. The firearm was in close proximity to Ford and could easily have been retrieved by him. Inside Ford's pants was a large bag with four smaller bags located inside. The smaller bags contained 35.16 grams of methamphetamine, 18.58 grams of cocaine base, 7.04

grams of cocaine HCL and 31.05 grams of heroin and fentanyl mix.¹ In the center console a brown prescription bottle with no label on it with 12 white pills inside was located. The pills were tested by the Michigan State Police Crime Lab and tested positive for oxycodone.

8. Ford lied about his identity to the on-scene officers. Ford identified himself as Lemarion Thomas, who is his brother. Ford was later identified through contact with his mother and other officers who are familiar with him. Facial recognition provided by MSP and the FBI both came back to Ford.

9. Officer Gibson interviewed Ford after reading him his Miranda Rights. After waiving his rights, Ford admitted that he bought the drugs from Twan Hard. He had called Twan and made arrangements to purchase the narcotics for \$1,000. Ford arrived at the location on Ambassador Drive, hid the money in a curb near the dumpster and drove around. Twan called Ford after he showed up and counted the money. Twan hid the drugs under the dumpster. Ford went back and took possession of the drugs. He called Haynes over to where he was at. The plan was for Haynes to drive Ford over to Ford's mother house so he could keep the drugs over there. He didn't store the drugs at his house. Ford has Haynes drive him because he does not have a driver's license. However, when Haynes showed up, they

¹ All the narcotics were sent to the Michigan State Police Crime Lab and tested positive for the substances listed.

sat in the car and smoked. After smoking, they fell asleep until officer Gibson showed up. Haynes' truck was parked next to the vehicle they were in when officer Gibson arrived. Ford advised that he goes to a house on Granger, and he has an old guy who slow rolls it for him. Ford advised that he has seen his contact with 10-20 pounds of drugs at a time while sitting in Ambassador parking lot. He advised he goes to places like Oregon and Detroit and comes back with large amounts of drugs."

10. Devontae Haynes is the owner of both firearms and has a valid CPL. However, Haynes reported the Springfield Armory XD-40 stolen with the Saginaw Police Department less than 24 hours prior to this incident.

11. Based on my training and experience the amounts of narcotics possessed are not consistent with personal use. The way they are individually packaged indicates the intent was to distribute them. Furthermore, based on my training and experience it is common for drug dealers to keep firearms on them due to the nature of their illegal activity to protect their drugs, assets, and themselves from being robbed by competitors. It is probable that Ford was using the reported stolen firearm for protection as it was in close proximity to his location, could easily have been retrieved and was loaded with one in the chamber and ready to fire. Haynes had a firearm not in a holster and was carrying it in his waistband in a manner that was easily accessible and ready to use. Haynes was aware of the illegal narcotic activity as he was to drive Ford's rental vehicle for him.

12. Based on the foregoing, there is probable cause to believe that on September 28, 2023, in the Eastern District of Michigan, Deontae Ford possessed numerous controlled substances with the intent to distribute them in violation of Title 21 U.S.C. § 841(a)(1) and that he possessed a firearm in furtherance of a drug trafficking offense, in violation of Title 18, U.S.C. § 924(c)(1)(A)(i).

Dated this 21st day of December 2023



Leon Wilson
Task Force Officer,
Federal Bureau of Investigations

Sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Patricia T. Morris
United States Magistrate Judge

Dated December 21, 2023